

U.S. BANKRUPTCY COURT
Southern District of Texas
Houston Division

IN RE:
HIGHLAND SALON, LP, Debtor

CASE NO. 24-33557
(Chapter 11)

MOTION TO DISMISS CASE
VIOLATION OF BLR 1017-2(a)(2)

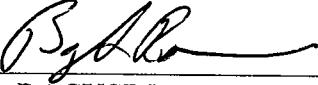
TO THE COURT:

1. RAUNA INMOBILIARE, LLC pursuant to 11 USC §1112 hereby moves the Court to dismiss the above referenced Bankruptcy Case as the filing of said Case violates BLR 1017-22(a)(2).
2. The said Case was initiated and filed PRO SE by Manuel Guevara on behalf of the Debtor. Manuel Guevara is not an attorney and is not admitted to practice law. The filing by Mr. Guevara is in violation of BLR 1017-2(a)(2) which provides as follows: "The failure of a non individual debtor to act through counsel in the filing of a bankruptcy petition or the prosecution of a case;"
3. The Case should be classified as a Single Asset Real Estate (SARE) case on the Court's Docket.
4. The Court should dismiss the above referenced Bankruptcy Case *sua sponte* without Hearing or on conclusion of Show Cause Hearing on September 4, 2024.

Dated: August 7th, 2024.

Respectfully submitted,

RACUSIN & WAGNER, L.L.P.

By: 
BARRY L. RACUSIN, P.C.
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CERTIFICATE OF SERVICE

A copy of this Motion was served on the persons shown on Exhibit "A" hereto at the addresses reflected on said Exhibit "A" on the 7th day of August 2024 by either certified mail, return request requested or by prepaid United States first class mail, as indicated. Movant certifies that movant has complied with Bankruptcy Local Rule 4001.


Barry L. Racusin, P.C.
Movant's Counsel

EXHIBIT A TO MOTION

SERVICE LIST

1. DEBTOR

Highland Salon, LP
Attn; Manuel Guevara
21720 Highland Knolls Drive
Katy, Texas 77450-5441

CM/RRR #7018 0680 0002 2824 2334
and
FIRST CLASS MAIL

2. U.S. Trustee
Hector Duran, Jr.
U.S. Trustee
Office of the U.S. Trustee
515 Rusk Avenue, Ste. 3516
Houston, Texas 77002

CM/RRR #7018 0680 0002 2824 2341
and
VIA EMAIL: hecorduran.jr@usdoj.gov

3. Unsecured Creditors

O'Connor & Associates
2200 N. Loop W.
Unit 200
Houston, Texas 77018.

FIRST CLASS MAIL

Erick DeLaRue, PLLC
2800 Post Oak Blvd.
Suite 4100
Houston, Texas 77056

FIRST CLASS MAIL

Bryant Harvey Wry PLLC
1500 CityWest Blvd.
Suite 525
Houston, Texas 77042

FIRST CLASS MAIL

Hunter Kelsey of Texas
7200 N. Mopac Expressway Service Road
Suite 120
Austin, Texas 78731

FIRST CLASS MAIL